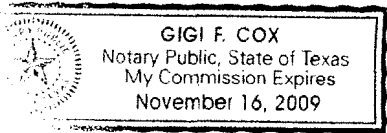



EXHIBIT PP

**Keyes EEOC Charge,
HOU00146312-146315**

PRIVILEGED

CHARGE OF DISCRIMINATION		AGENCY <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER 460-2009-04181
TEXAS WORKFORCE COMMISSION, CIVIL RIGHTS DIVISION and EEOC			
<small>State or local Agency, if any</small>		<small>S.S. No.</small>	
NAME (Indicate Mr., Ms., Mrs.) Ms. Paula Denise Keyes		HOME TELEPHONE (Include Area Code) 281-495-4349	
STREET ADDRESS 13010 Lawsons Creek Lane		CITY, STATE AND ZIP CODE Houston, Texas 77072	
		DATE OF BIRTH Sept. 11, 1967	
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME City of Houston, Texas / Houston Fire Department		TELEPHONE (Include Area Code) 713/ 837-0311	
STREET ADDRESS 901 Bagby		CITY, STATE AND ZIP CODE Houston, TX 77002	
		COUNTY Harris	
NAME		TELEPHONE NUMBER (Include Area Code)	
STREET ADDRESS		CITY, STATE AND ZIP CODE	
		COUNTY	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))			DATE DISCRIMINATION TOOK
<input checked="" type="checkbox"/> RACE <input checked="" type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> AGE <input type="checkbox"/> RETALIATION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify)			2001 July 7, 2009 <input checked="" type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
<p>I. I went through the Houston Fire Academy in 2001. While I was there an investigation was conducted to determine if certain trainees were being treated harsher than White male trainees. I did not file a complaint but I was told that my treatment at the academy was part of the investigation. In addition, other trainees commented to me and others that it appeared that I was being treated differently than other trainees and I was being subjected to harsher treatment and requirements than other trainees. I did not pursue any claims against HFD at this time and I was not advised the outcome of the investigation.</p>			
			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedure.		NOTARY - (When necessary for State and Local Requirements)	
		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
I declare under penalty of perjury that the foregoing is true and correct.		SIGNATURE OF COMPLAINANT	
		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)	
Date 16 July 2009  Charging Party (Signature)		16th day of July 2009	

(continued on next page)

PRIVILEGED

HOU00146312

EEOC Charge No. 460-2009-04181

Charging Party: Paula Keyes

Respondent: City of Houston, Texas /
Houston Fire Department

- III. During my employment with HFD I have been subjected to discrimination regarding fire station assignments. As a courtesy, before a firefighter posts to an open position at a fire station, they are encouraged to call the captain of the shift to talk to them about the posting. It is not a requirement but suggested in an attempt to avoid any animosity that may be generated if a firefighter posts to a opening without getting the informal okay from the captain. In early 2008, I was ending a temporary assignment and called numerous fire stations that had open slots posted as available. Each fire station captain I spoke with gave me an excuse to prevent me from posting to the open position. I was told the shifts were full even though open positions remained on the list and that they had someone in mind that was going to post to open position, but would not tell me if that would open a slot on another shift. One captain told me that he wanted to keep the rookie assigned to his station. I finally realized that I could not risk calling all the captains who had open positions because then I would be forced to post to a position over the captain's objections so I eventually posted to an open position without calling the Captain first.
- IV. In 2009, I attended the Air Rescue Firefighting ("ARFF") certification program at the HFD Academy. In order to be assigned to work at the fire stations at the airports, a firefighter has to successfully complete this course. After completion of the program, I was assigned to work at Fire Station 54 at Intercontinental Airport. I began working at Station 54 on the A shift on April 8, 2009. Station 54 has a separate woman's sleeping area, unlike most older fire stations. Firefighters are responsible for cleaning their own dorm and bathrooms. When I started working at Station 54, there was only one other female firefighter, Jane Draycott, assigned to the station and we both worked on the A shift. I was aware that the male firefighters did not associate with her during the down time and that she had been subjected to harassing behavior and conduct.
- V. I arrived for my tour on July 7, 2009 at approximately 6:30 a.m. This was my first tour since I left the station the morning of June 30, 2009. When I arrived at the station, I noticed Jane Draycott standing on the apparatus floor with the captain. When I approached them, Draycott warned me that the female dorm room was a mess and I did not want to go in there. I went into the female dorm room and saw writing on the walls and my personal photographs on the floor. The photographs I had at the firehouse were kept inside my locker near my bed. I also saw that Draycott's locker was open and all of her photographs had been vandalized and were written on with what appeared to be the same black marker that was used to write on the walls. I then picked up my photographs from the floor to inspect them and found that my photographs had also been vandalized and had been written on with a black marker.

EEOC Charge No. 460-2009-04181

Charging Party: Paula Keyes

Respondent: City of Houston, Texas /
Houston Fire Department

- VI. On July 7, 2009, written on the walls above the desk, and on the back of the pull down bed on my side of the dorm were the words "die nigger" (sic). On Draycott's side of the female dorm room the words "nigger lover" (sic) and "die bitch" were written on the wall above her desk on either side of a photograph that was on Draycott's desk. The word "die bitch" were also written on Draycott's locker door. A photograph of Draycott's teenage daughter that was killed in a car accident about two years ago was also vandalized. This photograph was kept by Draycott inside her locker and the word "dead" was written in black marker over Draycott's daughter's face. It appeared to me that all the vandalism and writing was done with the same type of black marker and handwriting looked like it was done by a single person.
- VII. I contacted Captain Jordan, President of the Black Firefighters Union, to report the incident. Later that day, Draycott and I also provided statements to HFD about the event.
- VIII. I was on vacation on June 27, 2009 but was told of the events that occurred that day by Draycott when I returned to work on June 29, 2009. Draycott said that on June 27, 2009, someone had turned off the cold water in the female shower causing her to be scalded when she went to take her shower and also that the speaker in the female dorm had been turned off so she could not hear any pages or any calls that might have gone out. None of the male firefighters denied that these events had occurred. While I had not made any complaints about my treatment at Station 54, I was aware that Draycott had made complaints prior to July 7, 2009 about harassment, offensive conduct, and the hostile work environment.
- IX. After the incidents of July 7, 2009, I was placed on leave. The reason I was told I was being placed on leave was to allow an investigation to take place and appropriate actions to be instituted before I returned to work.
- X. The City of Houston, Texas / Houston Fire Department has engaged in a pattern and practice of targeting female firefighters and Black / African American firefighters and subjecting these firefighters to harassment and a hostile work environment.

EEOC Charge No. 460-2069-04131

Charging Party: Paula Keyes

Respondent: City of Houston, Texas /
Houston Fire Department

- XI. The actions directed towards me and other female firefighters were demeaning, humiliating, hostile, aggressive, unprofessional and constituted sexual harassment that was severe, egregious, pervasive and altered the terms and conditions of my employment. These events occurred continuously from 2001 until I was placed on leave on July 7, 2009.
- XII. I was targeted for harassment, a hostile work environment, and discrimination because of my gender (female) and my race / color.
- XIII. I have not attempted to list every act or detail in this charge.
- XIV. I expressly state that I want this charge filed with both the EEOC and the State or Local Agency.
- XV. I have been discriminated against, subjected to different terms and conditions of employment, and to harassment because of my gender (female) and my race and color (African American / Black) in violation of Title VII of the 1964 Civil Rights Act, as amended, 42 U.S.C. § 2000e, *et seq.*, and the Texas Commission on Human Rights Act, as codified in the Texas Labor Code § 21.001, *et. seq.*